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June 1, 2000

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**Revised and Corrected Version 6/5/00**

Mr. Jim Growney, Unit Chief  
Remediation Unit  
Missouri Department of Natural Resources  
Division of Environmental Quality  
P.O. Box 176  
Jefferson City, Missouri 65102-0176

Re: **Mid-States Paint & Chemical Co.**  
**9315 Watson Industrial Park, St. Louis, MO**  
**ST0000821, P00058 77**

Dear Mr. Growney:

Thank you for a copy of your letter of May 12, 2000. We were unaware that a copy of the Bingham Resources report had been submitted to the State on April 13, 2000, for its consideration. On or about April 22, 2000, representatives of RNC received an unsigned version of the report, without any transmittal letter to the State. Following a meeting with representatives of Mid-States in January 2000, we were under the belief that we would be receiving a copy of the report for review and comment.

In light of your letter, our technical remarks will be directed to you, as well as representatives of Mid-States. We believe it regrettable that the State reached a decision based on an incorrect analysis before receiving our comments. We will address the most significant points first.

**MDNR Conclusion #1**

Following a data comparison set forth in the Bingham Resources report, your letter contains a statement similar to one contained in the report:



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